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9 Attorneys for Defendants USIIC, LLP

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 SAEID MOHEBBI,

14 Plaintiff,

15 v.

16 MAHNAZ KHAZEN, et al.,

17 Defendants.

Case No. 5:13-cv-03044-BLF

Hon. Beth Labson Freeman

**AMENDED DECLARATION OF RAY E.  
GALLO IN SUPPORT OF ATTORNEY'S  
MOTION TO WITHDRAW AS COUNSEL  
FOR DEFENDANT USIIC, LLP**

1 I, Ray E. Gallo, declare:

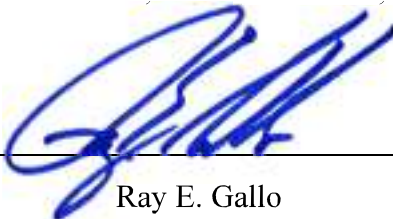
2 1. I am an attorney at law, duly licensed to practice law before all of the courts of the  
3 State of California. I am counsel for Defendants USIIC, LLP in the above-entitled action. I have  
4 personal knowledge of the matters set forth herein. If called to testify, I could and would testify  
5 competently to the matters set forth below.

6 2. The specific facts that support this motion must remain confidential. California  
7 Business and Professions §6068(e), California Rule of Professional Conduct 3-100(A), and  
8 attorney-client privilege (Fed. Rule of Evidence 501; California Evidence Code §§950, *et seq.*). If  
9 the Court requires further information or evidence to rule, I can and will offer it in camera,  
10 without other parties. (*Manfredi & Levine v. Superior Court*, 66 Cal.App.4th 1128, 1136-1137  
11 (1998); CRPC 3-700(B) or (C)).

12 3. Without limitation: (a) Defendant USIIC, LLP has failed to take my advice to  
13 retain the same new counsel as defendant Mahnaz Khazen herself and other co-defendants have  
14 already retained in this action. (*See* Dckt #85 and #93.) Notably, defendant is owned by Mahnaz  
15 Khazen. Ms. Khazen insists that the company named “USIIC, LLP” does not exist and, therefore  
16 she says, she has no obligation to retain new counsel; (b) the communication and relationship  
17 between Gallo and Defendant USIIC, LLP and its owner, Mahnaz Khazen, has deteriorated such  
18 that Gallo can no longer serve the party; and (c) Gallo's contract with the party specifically  
19 contemplates and permits Gallo to withdraw under the facts that now exist.

20 4. For Defendant USIIC, LLP, the current telephone number is (408) 835-7030 and  
21 the current mailing address is 3031 Tisch Way, Suite 500, San Jose, CA 95128.

22 I declare under penalty of perjury under the laws of the United States of America that the  
23 foregoing is true and correct. Executed on October 4, 2018 at San Juan, Puerto Rico.

24  
25  
26   
Ray E. Gallo